

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HEATHER L. EASON, :

Plaintiff, :

-against- :

GP AVIATION SERVICES, LLC, :
EAST WEST FLIGHT, LLC and :
THOMAS CONNELLY, :

Defendants. :

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08 Civ. 3557 (SCR)

PLAINTIFF’S RESPONSE TO
DEFENDANT’S REQUEST
FOR PRODUCTION OF
DOCUMENTS AND THINGS

PLEASE TAKE NOTICE, that Plaintiff, Heather Eason, by her attorneys, Baker, Leshko, Saline & Blosser, LLP, responding to Defendant’s Request for Production of Documents and Things, states as follows:

REQUEST 1: All medical reports, hospital records, physicians’ records or written, printed or recorded documents of any type which describe or relate in any way to the alleged injuries of plaintiff.

RESPONSE 1: Authorizations permitting defendants to obtain plaintiff’s medical records are attached hereto as Exhibit “A”.

documents which describe or relate in any way to medical or other expenses incurred by plaintiff as a result of her alleged injuries.

RESPONSE 2: See Response 1.

REQUEST 3: All medical reports, hospital records, physicians' records, papers, notes, x-rays or results of any other similar diagnostic tests, and any other documents, whether written or recorded, which describe or relate in any way to any illness or injury suffered by the plaintiff to the same body part or parts about which he complains in the captioned during the three (3) years preceding the date of the injury described in the Complaint.

RESPONSE 3: See Response 1.

REQUEST 4: Duly executed current authorizations permitting this office to obtain and make copies of all hospital, medical and/or x-ray records which describe or relate in any way to plaintiff's injuries and to all hospital, medical and/or x-ray records relating to any illness or injury suffered by the plaintiff to the same body part or parts about which she complains in the captioned action during the three (3) years preceding the date of the injury described in the Complaint.

RESPONSE 4: Not applicable as plaintiff has no prior injuries to the same body parts complained of in this action.

REQUEST 5: All statements, whether written or recorded, made or taken from any person who was a witness to the incident described in the Complaint.

RESPONSE 5: Attached as Exhibit "B" please find a copy of the recorded message left by the pilot, Gary Trageser, on Ms. Eason's cellular phone.

representatives claim were witnesses to the incident complained of or who have knowledge of the incident complained of.

RESPONSE 6:

1. Heather Eason, 94 Sally Hardin Road, Sussex, New Jersey 07461.
2. David Solomon, address unknown.
3. Gary Trageser, address unknown.
4. Thomas Connelly, address unknown.
5. Elaine Lapitosky, address unknown.
6. Pat Kornayk, address unknown.
7. Nancy Gerherdt, address unknown.
8. Richard Conrad, address unknown.
9. Rob Liplsky, 94 Sally Hardin Road, Sussex, New Jersey 07461.
10. All health care professionals whose addresses are included on the authorizations provided.

REQUEST 7: All photographs taken on or since the date of the injury referred to in the Complaint of plaintiff depicting or relating in any way to the injuries allegedly sustained by the plaintiff on the date referred to in the Complaint.

RESPONSE 7: No photographs exist.

REQUEST 8: All photographs taken of the location where the injury was allegedly sustained.

RESPONSE 8: No photographs exist.

for the injuries described in the Complaint.

RESPONSE 9: Plaintiff has no medical insurance. New Jersey Worker's Compensation provided coverage for plaintiff's injuries. An authorization to obtain plaintiff's worker's compensation file is attached hereto as Exhibit "C".

REQUEST 10: All reports of experts which plaintiff intends to call to testify on plaintiff's behalf at the time of trial.

RESPONSE 10: Plaintiff has not retained any experts at the present time and will disclose such information at the time such expert(s), if any, is retained and in accordance with the FRCP.

REQUEST 11: All police reports or accident reports which describe or relate in any way to the incident described in the Complaint.

RESPONSE 11: Ms. Eason filed an accident report with her employer, Jet Professionals, but does not have a copy in her possession.

REQUEST 12: If plaintiff claims loss of income or future earning capacity as a result of the injuries described in the Complaint, all federal, state and local income tax returns filed by plaintiff for the years 2004, 2005, 2006 and 2007 including executed authorizations to obtain copies of plaintiff's tax returns for these years.

RESPONSE 12: Attached hereto as Exhibit "D" please find an authorization to obtain a copy of plaintiff's income tax returns.

REQUEST 13: Duly executed and acknowledged written authorizations permitting this defendant to obtain, copy and examine any employment file and records.

RESPONSE 13: Employment Record Access Authorizations are attached hereto as Exhibit "E".

Dated: White Plains, New York

84.00

BAKER, LESHKO, SALINE & BLOSSER, LLP

Attorneys for Plaintiff

By: _____

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**THE EXHIBITS TO THIS DOCUMENT HAVE BEEN SENT
TO OPPOSING COUNSEL. IF YOU WISH TO REVIEW
THE SAME, PLEASE CONTACT COUNSEL FOR THE
PLAINTIFF.**